

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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SAFESPAN PLATFORM SYSTEMS, INC.,  
LAMBROS APOSTOLOPOULOS and  
PAUL KRISTEN, INC.,

**STIPULATION AND JOINT MOTION  
TO AMEND COMPLAINT AND  
JOIN PARTIES**

Plaintiffs,

Civ. No. 06-CV-726 A

v.

EZ ACCESS, INC. and  
ANASTASIOS G. HATSIOS,

Defendants.

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WHEREAS, Bridgeplatforms, Inc. ("Bridgeplatforms"), a New York corporation, was formed on or about November 13, 2008, during the pendency of this action;

WHEREAS, Linda Lee Noltee is the President of Bridgeplatforms and directs or controls certain activities thereof;

WHEREAS, George Hatsios is an officer, shareholder, employee and/or director of Bridgeplatforms and directs or controls certain activities thereof;

WHEREAS, Anastasios G. Hatsios is an officer, shareholder, employee and/or director of Bridgeplatforms and directs or controls certain activities thereof;

WHEREAS, Bridgeplatforms is in the business of making, using, selling and offering to sell bridge platform products and components thereof, which products and components are of the same nature and design as the products and components made, used, sold and offered for sale by defendant EZ Access, Inc.;

WHEREAS, defendants Bridgeplatforms, Linda Lee Noltee and George Hatsios hereby waive service of the Summons and First Amended Complaint, and agree that plaintiffs shall not be

required to serve them with process in the manner provided by Rule 4; and

WHEREAS, counsel for defendants EZ Access, Inc. and Anastasios G. Hatsios, Todd Wengrovsky, shall represent Bridgeplatforms, Linda Lee Noltee and George Hatsios in this action;

NOW, THEREFORE, in accordance with Fed. R. Civ. P. Rules 15(a)(2), 19 and 20, the parties to this action, by their undersigned counsel, hereby stipulate and move this Court for an Order:

(a) Granting plaintiffs leave to file the First Amended Complaint in the form attached as **Exhibit 1**, which adds Bridgeplatforms, George Hatsios and Linda Lee Noltee as defendants;

(b) Directing the Clerk of the Court to issue Summonses to defendants Bridgeplatforms, Linda Lee Noltee and George Hatsios in the form attached as **Exhibit 2**;

(c) Directing that the filing of the instant Stipulation and Joint Motion shall constitute service of process upon defendants Bridgeplatforms, Linda Lee Noltee and George Hatsios; and

(d) Directing defendants to file an Answer to the First Amended Complaint on or before July 13, 2009.

Dated: June 22, 2009

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Attorneys for Defendants

**SO ORDERED:**

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Hon. Richard J. Arcara  
Chief United States District Judge